

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO: 5:17CR00454
	:	
Plaintiff,	:	JUDGE JOHN R. ADAMS
	:	
-vs-	:	
	:	
JANICE M. SHUFFORD,	:	<u>DEFENDANT'S MOTION FOR</u>
	:	<u>EXTENSION OF TIME TO FILE</u>
Defendant.	:	<u>PRETRIAL MOTIONS</u>

Defendant, Janice M. Shufford, through undersigned counsel, hereby moves this Honorable Court for an extension of the pretrial motion deadline, presently scheduled for December 30, 2017, until January 12, 2018.

The defendant requests an extension of the pretrial motion deadline for the reason that counsel for the defendant received the government's response to the defendant's discovery request on December 27, 2017, three days before the pretrial motion deadline date. Counsel filed his discovery request on December 1, 2017. (Dkt 12) Counsel for the defendant requests additional time to review the 4.14 GB of discovery in this case and to evaluate what pretrial motions are warranted.

On December 22, 2017, an Unopposed Motion for Protective Order for Discovery by United States and Proposed Protective Order was filed. (Dkt. 14) The Proposed Protective Order

has not been issued by this Honorable Court as of the filing of the instant motion. Counsel cannot share the discovery information until everyone executes the Acknowledgment of Protective Order.

Wherefore, based on the foregoing, the defendant respectfully requests that this Court Order an extension of the December 30, 2017, pretrial motion deadline date until January 12, 2018.

Respectfully submitted,

STEPHEN C. NEWMAN
Federal Public Defender
Ohio Bar: 0051928

/s/TIMOTHY C. IVEY
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CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2017, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/TIMOTHY C. IVEY

Assistant Federal Public Defender

Ohio Bar: 0039246